



October 19, 2018

Ms. Anastasia Palivos  
Acting Commissioner  
Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield IL 62701

Dear Commissioner Palivos:

On behalf of the Illinois Manufacturers' Association and our members, thank you for the opportunity to offer comments regarding issues, challenges, and opportunities in the deployment of electric vehicles. It is critical that the Illinois Commerce Commission and policymakers understand the technical, financial, and policy implications of electric vehicles.

The Illinois Manufacturers' Association is a statewide trade association representing nearly 4,000 member companies and facilities many of who are involved in the automotive sector or supply chain. Illinois manufacturers are engaged in the production of all types of vehicles including electric (EV), hybrid, natural gas, autonomous (AV), and internal-combustion vehicles. The auto supply chain generates thousands of jobs and billions of dollars in economic activity annually. Amazing technology being developed on a daily basis is changing the face of transportation in Illinois and across the nation.

It's important that manufacturers produce a variety of vehicles – including electric vehicles - so that consumers have a choice. The IMA has a long-standing policy that state and federal policies and regulations should encourage competition rather than picking winners and losers. Competition results in lower prices, consumer choices, and increased efficiency as we have seen since the advent of electric deregulation in Illinois twenty years ago.

In Illinois today, there are 4.5 million private and commercial registered vehicles with less than 12,000 electric vehicles. While consumers should have access to every type of vehicle, the IMA has concerns about any government-mandated policies that would provide an unfair advantage to any particular vehicle. There are currently no market barriers to the deployment of EV charging stations and they are being installed at hotels, gas stations, restaurants, retail stores, and in homes based on need.

When considering important policies, it's critically important that the ICC maintains a healthy competitive environment that does not provide an unfair advantage and hurt the Illinois economy along with imposing higher costs on Illinois consumers.

Sincerely,

Donovan Griffith  
Director of Government Affairs